UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

24

OCT 5 1984

MEMORANDUM

SUBJECT: Transmittal of Inspection Report

FROM: Robert B. Dona RB Dona
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael J. Sanderson
Chief, AWCM/ARWM

This memorandum transmits the following joint RCRA compliance inspection report performed by the Field Investigations Section, Environmental Monitoring and Compliance Branch, Environmental Services Division:

Facility	EPA I.D. Number	Activity Number	Areas of Non-Compliance
Sporlan Valve Co. Washington, Mo.	MOD006299200	A034	Insufficient information on manifests. No office phone numbers for emergency coordinators.

Attachment

REPORT OF RCRA COMPLIANCE INSPECTION

AT

SPORLAN VALVE COMPANY

WASHINGTON, MISSOURI

EPA I.D. NUMBER: MOD006299200

AUGUST 28, 1984

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division (ARWM), a RCRA compliance evaluation inspection was performed at the Sporlan Valve Company facility in Washington, Missouri, on August 28, 1984. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Sporlan Valve Company:
Omar Tobben, Plant Superintendent
Vernon Krimmel, Quality Assurance and Waste Coordinator

U.S. Environmental Protection Agency (EPA):
John W. Bosky, Environmental Engineer

INSPECTION PROCEDURES

Upon arrival at the facility, I contacted Mr. Vernon Krimmel, Quality Assurance and Waste Coordinator. I presented him with my EPA credentials and explained the purpose of the inspection and the procedures that I would follow. The inspection consisted of a discussion of facility operations, waste generation and waste management practices, a review of the facility's hazardous waste management plans, programs and records, and a visual inspection of the waste management areas. At the conclusion of the inspection, I summarized and reviewed my findings and recommendations with Mr. Krimmel. I then provided Mr. Krimmel with a RCRA Inspection Confidentiality Notice which he signed as acknowledgement of receipt. A copy of this document is attached.

FACILITY DESCRIPTION

The Sporlan Valve Company facility in Washington, Missouri, manufactures thermo-expansion control valves for use in air conditioners and refrigerators. The majority of valves produced at this facility are of brass construction (estimated at around 93 to 94%) with lessor quantities constructed of bronze and Gra-Iron castings. The material of construction is selected based on the application and type of refrigerant charge. Brass valve bodies are cut and machined from 12-foot lengths of metal. Expansion elements and temperature control mechanisms are assembled into the valve bodies to produce the finished product. The facility manufactures the various valve components, but purchases all springs from off-site sources. All valves are tested prior to shipment to the customer. The facility employs approximately 245 persons and operates eight hours per day, five days per week. This facility is located at 611 East Seventh Street. The Sporlan Valve Company operates another facility in Washington, Missouri, which is located at 1699 West Main Street.

FINDINGS AND OBSERVATIONS

1. The Sporlan Valve Company facility in Washington, Missouri (611 East Seventh Street facility), submitted a Notification of Hazardous Waste Activity on July 7, 1980. This notification listed them as a generator of hazardous waste. On August 4, 1980, Sporlan submitted a request to amend the original notification to include the classification as a treatment/storage/disposal facility. Sporlan submitted a Part A Permit Application for this facility on November 19, 1980. On June 3, 1982, Sporlan submitted a response to the EPA (responding to a May 27, 1982, EPA letter regarding financial requirements for facilities) which stated that no hazardous waste was treated, disposed of, or stored on-site for over 90 days at this facility. On August 5, 1983, Sporlan formally requested that this facility's interim status be withdrawn. An additional letter from Sporlan to the MDNR dated August 7, 1984, indicates that Sporlan never utilized its interim status to treat, store (over 90 days) or dispose of hazardous waste.

2. As a result of its manufacturing operations, Sporlan generates various wastestreams, some of which are classified as hazardous. The following summarizes the wastes generated at this facility:

Waste Oil - Sporlan generates waste oil as a result of machining operations. Metal turnings and scrap pieces from machining operations, which are coated with a cooling oil, are placed into a dumpster for recycling purposes. The dumpster is located at a covered area next to the manufacturing building. This dumpster has a drain so that any cooling oil that drips off of the metal pieces will flow to a concrete sump situated under the dumpster. Facility representatives estimated that Sporlan generates around 1,200 gallons per year of waste oil from this operation. This waste oil is sent to Gateway Petroleum Company in East St. Louis, Illinois, for recycling and is transported using a manifest. Mr. Krimmel stated that this waste cooling oil from metal scraps is the only waste oil generated at Sporlan.

Spent Trichloroethylene - Sporlan uses trichloroethylene (TCE) to remove grease and oil from metal parts prior to further processing. Sporlan uses two separate systems for degreasing. One is a hand-operated system used for small metal parts and the other is an automatic revolving wheel type system. The parts are first cleaned by immersion into the TCE, and are then held in the vapor space over the vat of TCE. The systems' vapor spaces are cooled by cold water jackets. The system used to handle the small parts is cleaned out around once per year. The larger system is cleaned out every three to six months. The spent TCE removed from these systems is placed into drums and transported to Safety-Kleen in Hebron, Ohio, for solvent recovery. Mr. Krimmel stated that this spent solvent is not stored on site for over 90 days. Sporlan generates around four to five 55-gallon drums of spent TCE every six weeks. The spent TCE is classified as an F001 listed hazardous waste.

Spent Mineral Spirits - The Sporlan facility uses mineral spirits as a metal cleaner in a dip process. When spent, this solvent is placed into drums and sent to the Safety-Kleen facility in Hebron, Ohio, for solvent recovery. This spent solvent has been classified as an ignitable hazardous waste. Sporlan generates around ten 55-gallon drums of spent mineral spirits every six weeks. Mr. Krimmel stated that spent mineral spirits are never stored on site for over 90 days.

Spent Paint Thinner - Sporlan personnel use a paint thinner to clean painting equipment. Spent thinner used for cleaning is accumulated and stored in 55-gallon drums. Mr. Krimmel stated that this waste is never stored on site for over 90 days. The spent paint thinner has been classified as an ignitable hazardous waste and is transported to the Wastex Research facility in East St. Louis, Illinois, for solvent recovery. Approximately two 55-gallons drums of this waste are generated every three months.

Plating Wastes - The Sporlan facility operates two small electroplating lines. One plating line uses a zinc plating solution which does not contain any cyanides. The other plating line uses a cadmium solution which does contain cyanide. Rinse waters from these two plating lines are discharged to the municipal sanitary sewer system. Mr. Krimmel stated that no spent plating solutions have ever been discarded or discharged to the sewer system and that no sludges or solids have ever been removed from the plating line systems. During the visual inspection of the facility, low quantities of rinsewaters were observed discharging from the two plating lines (estimated at 1 gallon per minute or less). The zinc plating solution recirculates through a filtration system. Spent filters are discarded with the plant trash. The cadmium plating solution is not filtered. In the past, all elements used in the thermo-expansion control valves were plated using one of these two systems. Currently, all elements are painted and the plating lines are only used for steel, copper and cast iron valve components to be used in certain applications. The number of facility personnel working in the plating area have decreased from 13 to only one as a result of this change.

Spent Pickling Solution - Sporlan use muriatic acid to clean and prepare metal parts for plating. This preparation step was also referred to as a "pickling" procedure. Mr. Krimmel stated that this pickling solution was seldom discarded as a waste, but that when it became necessary, the spent acid was neutralized with lime and discharged to the municipal sanitary sewer system. The vat used for pickling contains an estimated 20 gallons of acid. This waste is classified as a K062 - listed hazardous waste.

Spent Paint Filters - Sporlan conducts spray painting of valve components in a booth which has a dry filter system to clean paint overspray from the exhaust draft. The filters in the spray booth are removed and discarded around once per week. Sporlan has classified these spent filters as non-hazardous. Mr. Krimmel stated that the paint on these filters is dried hard when they are discarded and that the facility has not had any problems with spontaneous combustion of the spent filters. Filters are disposed of with the plant trash. Sporlan does not use any lead based paints.

3. At the time of this inspection, Sporlan was storing drummed hazardous waste at an area located inside of the manufacturing building. All drums of waste were closed, properly labeled and in good condition. In addition, the drums were located within a concrete containment structure. It should be noted that the storage area appeared clean and well-organized. Also, adequate aisle spacing had been left between the rows of drums. No drums were dated over 90 days previous to the date of the inspection.

4. During the inspection, Mr. Krimmel stated that small amounts of waste lacquer thinner are brought to this facility from the other Sporlan plant in Washington, Missouri (1699 West Main Street). Mr. Krimmel said that the amount of thinner waste taken from this off-site source averages around five gallons every two weeks. It should be noted that this wastestream has been classified as hazardous due to ignitability only and that it is transported to Wastex for solvent recovery.

5. Prior to 1983, waste oil generated at the Sporlan facility was collected by Bliss, Inc. Waste mineral spirits were mixed with the waste oil during this period. In addition, drummed solvents were stored by the outside oil sump and were removed by Bliss, Inc. (drums pumped into a bulk tanker) when they came to pick up the waste oil. No manifests were used to document these shipments of waste. This situation is further detailed in the report of a May 23, 1983, compliance evaluation inspection at Sporlan Valve by the Missouri Department of Natural Resources. Sporlan's first manifested off-site shipment of hazardous waste occurred on April 28, 1983. Mr. Krimmel stated that Bliss personnel had not informed him of any of the requirements for transporting hazardous waste and that he was informed of the requirements by Safety-Kleen representatives. Mr. Krimmel further stated that he did not know the final disposition of the waste solvent removed by Bliss, Inc.

6. The facility contingency plan did not list an office phone number for the emergency coordinators pursuant to 40 CFR 265.52(d). In addition, although the contingency plan appeared to meet the minimum regulatory

standards, it was somewhat vague and/or general in some areas. Mr. Krimmel stated that he intended to revise the facility contingency plan and would include more specific details in the plan.

7. A review of Sporlan's manifest records shows that the manifests used to transport hazardous waste from the facility do not list any emergency instructions and special handling procedures pursuant to 10 CSR 25-5.010 (4)(C)(10). In addition, the manifests do not consistently list the generator's and final facility's EPA I.D. numbers or the transporter's State I.D. number pursuant to 10 CSR 25-5.010(4)(C)(2, 4 and 5).

8. Sporlan has requested that the facility's interim status be withdrawn. When asked during the inspection, Mr. Krimmel stated that he did not think any hazardous waste had ever been stored on site for a period exceeding 90 days. Mr. Krimmel further stated that although manifest records could be used to show that on-site storage never exceeded 90 days after April 1983, he did not think that he could locate any records for the time period prior (when hazardous wastes were being shipped off site without a manifest) which could show conclusively that wastes were stored less than 90 days.

RECOMMENDATIONS

1. All manifests used to transport hazardous wastes off site should include all of the required information pursuant to State and Federal regulations.

2. The facility contingency plan should be amended to include the office phone numbers for all emergency coordinators.

John W Bosky

John W. Bosky
Environmental Engineer
Date: 10-5-84
Activity Number: A034

Robert B. Dona

Robert B. Dona
Chief, Field Investigations Section
Date: Oct 5, 1984

Attachments:
Inspection Checklist (2 pages)
RCRA Confidentiality Notice (3 pages)

HAZARDOUS WASTE GENERATOR CHECKLIST

Name of Facility: SPORLAN VALVE COMPANY   Date: AUGUST 28, 1984

Address: 611 EAST SEVENTH STREET
WASHINGTON, MISSOURI 63090   Missouri I.D. # 03489

Facility Representative: VERNON KRIMMEL   EPA I.D. # MOD006299200

Title: QUALITY ASSURANCE AND WASTE COORDINATOR   Phone Number 314/239-3732

Is this facility a TSD? SEE NARRATIVE   Transporter? No , # N.A.

Provide a brief description of the manufacturing process. SEE NARRATIVE

List the hazardous wastes produced: SEE NARRATIVE

	Waste	Amount/month	Kilogram/month	I.D. #	Disposition
1.					
2.					
3.					
4.					
5.					
6.					
	Total				

Subtract amount going to Resource Recovery or sewer ______

Amount subject to generator fee ______ (Fee is applicable if this value is over 10 kkg annually. Fee based on generation from July 1 through June 30)

Is generator fee applicable to this facility? Yes ____ No ____ (If yes, is it being paid? Yes ____ No ____)

Is the head tax applicable to this facility? Yes ____ No ____ (If yes, is it being paid? Yes ____ No ____)
(Quarterly ____ Annually ____)

Is the land disposal fee applicable to this facility? Yes ____ No ____ (If yes, is it being paid? Yes ____ No ____)

If the total amount of hazardous waste generated is less than 100 kg/month, is over 100 kg ever accumulated? Yes ____ No ____

If the total amount of hazardous waste generated is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes ____ No ____

If 1000 kg is never accumulated, is hazardous waste disposed of within 1 year? Yes ____ No ____

Has the generator determined if waste is hazardous? Yes ____ No ____

A. MANIFESTS 10 CSR 25-5.010(4) 1st MANIFEST DATED 4/29/83

1. Generator's Missouri and EPA I.D. Numbers .... ■ No EPA #
2. Serially increasing shipment number .... ☑
3. Mo. waste I.D. # correct .... ☑
4. Generator's name, address, phone number, EPA I.D. number .... ■ NO EPA #
5. All transporters' names, ~~addresses, phone numbers~~, and EPA I.D. numbers .... STATE I.D. # ■ NOT ALL HAD STATE #
6. Hazardous waste management facility name, address, phone number, and EPA I.D. number .... ■ NOT ALL HAD EPA # (TCE → S.K.)
7. Proper DOT shipping name and hazard class .... ☑
8. Quantity, container type, and number of units being shipped. WEIGHT INCLUDED ON A SEPARATE BILL OF LADING. .... ☑ NO WEIGHTS
9. Emergency instructions and special handling procedures .... ■ NONE
10. Proper certification .... ☑
11. Manifest properly signed and dated .... ☑
12. Time between generator and facility signature no more than 10 days .... ☑
13. Manifests returned within 30 days .... ☑
14. If not, exception generator report submitted within 45 days .... N.A.
15. Completed manifests submitted to Department quarterly .... ☑

B. CONTAINERIZATION AND LABELING 10 CSR 25-5.010(6)

16. Waste stored in proper DOT containers .... ☑
17. Containers labeled "Hazardous Waste" and labeled per proper DOT requirements during storage .... ☑

C. STORAGE STANDARDS 10 CSR 25-7.050

18. Facility inspected and maintained .... ☑ 3 TIMES/W/LC
19. Ignitable and reactive wastes properly handled .... ☑
20. Date of accumulation marked .... ☑
21. Storage less than 90 days (if applicable) .... ☑
22. Waste oil properly handled .... ☑

For storage or generation in every month of less than 1000 kg, proceed to Section G.
For storage or generation in any month of over 100[redacted] co[redacted]te Sectio D, E, and F.

D. PERSONNEL TRAINING 10 CSR 25-7.050 cross-referenced to 10 CSR 25-7.011(3)(F)

23. Completed classroom or on-the-job training .... [✓]

24. Job title, description, and name of person filling position .... [✓]

25. Written record of the type and amount of training given .... [✓]

26. Documentation confirming that training has been given .... [✓]

E. PREPAREDNESS AND PREVENTION 10 CSR 25-7.050(2)(A) cross-referenced to 10 CSR 25-7.011(4)

27. Internal communication or alarm system .... [✓]

28. Device in the hazardous waste operation area capable of summoning emergency assistance .... [✓]

29. Fire control, spill control, and decontamination equipment available .... [✓]

30. Adequate water supply for fire control equipment .... [✓]

31. Adequate and proper safety equipment available .... [✓]

32. Adequate aisle space .... [✓]

33. Arrangements with local emergency agencies .... [✓] F.D./B.D. DR. ZAHN/HOSP.

F. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-7.050(2)(A) cross-referenced to 10 CSR 25-7.011(5)

34. Contingency Plan .... [✓]

35. Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste .... [✓]

36. Describe formal arrangements with emergency agencies ..... [✓]

37. Names, addresses, and phone numbers (home & office) of emergency coordinators .... [■]

38. Emergency equipment including its description and location .... [✓]

39. Evacuation plan if applicable .... [✓]

Comment: ______

ENTIRE PLAN IS GENERAL & SOMEWHAT VAGUE. DOES APPEAR TO MEET REGULATORY STANDARDS. POSSIBLE IMPROVEMENTS WERE DISCUSSED WITH MR. KRIMMEL.

G. CONTAINER STORAGE 10 CSR 25-7.050(3)

40. Containers in good condition .... [✓]

41. Containers storing incompatible wastes or products are separated or protected from each other .... [ ] N.A.

42. Containers kept closed in storage .... [✓]

43. Containers stored within a waste confinement structure (if applicable) that meets the criteria of 10 CSR 25-7.050(3)(F) .... [✓]

44. Containers of ignitable or reactive waste are stored at least 50 feet from the property line .... [✓]

Comment: ______

[redacted]HAZARDOUS [redacted]E STORAGE TANKS *NOT APPLICABLE*

Waste Contained	Volume of Tank

H. STORAGE TANKS 10 CSR 25-7.050(4) *NOT APPLICABLE*

45. Tanks in good condition .... [ ]

46. Procedure for inspecting tanks .... [ ]

47. Above ground tanks - adequate spill confinement structures .... [ ]

48. Underground tanks that cannot be entered have adequate leak detection systems .... [ ]

49. Leak detection procedure and schedule developed and used .... [ ]

50. Open tanks have _____ ft. freeboard .... [ ]

51. Incompatible wastes in tanks safely and properly stored .... [ ]

52. Volatiles are not placed in open tanks .... [ ]

53. Ignitable or reactive wastes in tanks safely and properly stored .... [ ]

54. Ignitable or reactive wastes in covered tanks stored in accordance with NFPA's buffer zone requirements ..... [ ]

55. Controls to prevent overfilling .... [ ]

56. Daily inspection of overfilling control equipment .... [ ]

57. Daily inspection of freeboard in uncovered tanks .... [ ]

Comments: ______

Inspector's Signature *John W Boody*
Title *ENV ENGR*
Office *USEPA REGION VII ENSV/EMCM/FIN*

Please mark boxes as shown

[✓] In compliance

[■] In violation

U.S. ENVIRONMENTAL PROTECTION AGENCY

RCRA INSPECTION
CONFIDENTIALITY NOTICE

Name and Address of Inspector(s)	Name and Address of Facility
JOHN W. BOSKY U.S EPA REGION VII ENVIRONMENTAL SERVICES DIVISION 25 FUNSTON ROAD KANSAS CITY, KANSAS 66115	SPORLAN VALVE WASHINGTON MO
	Owner, Operator, or Agent in Charge • OMAR TOLBERT
	Title PLANT SUP.
	Address WASHINGTON MO

Name of Individual to Whom Notice Given	Title	Date
VERNON RUMMEL	QUALITY MGR; WASTE MGR	8-24-89

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE	Facility

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

The statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Air and Waste Management Division
United States Environmental Protection Agency
324 E. 11th Street
Kansas City, Missouri 64106

and mailed by registered, return-receipt requested mail within seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receciving this Notice:

I have received and read this Notice.

Name Donna Kreimer

Title _____

Signature _____

Date 8/28/84

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name _____

Title _____

Address _____

_____

U.S. ENVIRONMENTAL PROTECTION AGENCY
324 EAST 11TH STREET
KANSAS CITY, MISSOURI 64106

REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual	Title	Date
OMAR TOBIEN	PLANT SUP	4-28-84
Firm Name	**Firm Address**	
SPERIAN VALVE	WASHINGTON MO	

Information for which Confidential Treatment is requested:

Acknowledgement by Claimant

The undersigned requests that confidential-treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40FR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures: (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)	Title
Name of Inspector **Title**	**Inspector's Signature**
JOHN W BOSKY ENVIRONMENTAL ENGINEER	John W Bosky